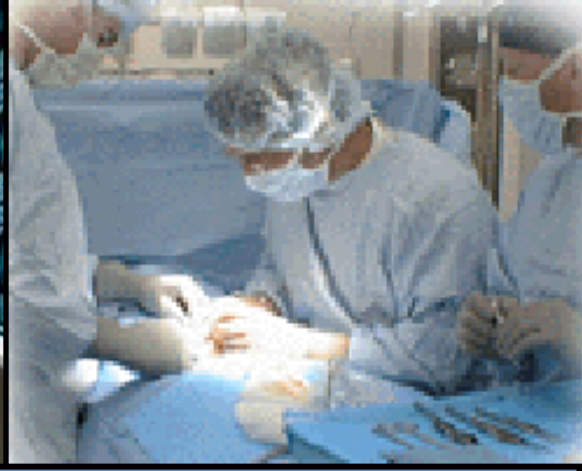
National Cancer Institute



An Introduction to the NCI's Adult CIRB - Early Phase Emphasis

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U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
National Institutes of Health

Agenda

- Overview of the CIRB Model
- How it Works:
  - CIRB Review
  - Enrollment
  - Local Context Review

National Cancer Institute

Overview of the CIRB Model

- **Goal of the CIRB**
  - ***Reduce the significant local administrative burdens of IRB review for multi-site trials while maintaining a high level of human subjects protection***
- **Four CIRBs**
  - ***Adult CIRB – Late Phase Emphasis (LPE)***
    - **Began reviews of Cooperative Group Phase 3 treatment trials in 2001**
  - ***Adult CIRB – Early Phase Emphasis (EPE)***
    - **Began reviews of phase 0, 1, 2 trials late 2013**
  - ***Pediatric CIRB***
    - **Began reviews of COG phase 2, 3 and pilot trials in 2004**
  - ***Cancer Prevention & Control (CPC) CIRB***
    - **Established December 2014, to begin reviews January 2015**

Overview of the CIRB Model

- **Historic Facilitated Review Model**
  - ***From 1999 – December 31, 2013, operated under a "shared responsibilities" model where IRB review responsibilities were shared by the CIRB and Local IRB***
- **Independent Model**
  - ***As of January 1, 2014, the CIRB operates as an "independent model"***
  - ***CIRB continues to review studies as before***
  - ***CIRB becomes IRB of Record for investigators***
    - **Local IRB has no review responsibilities**
  - ***CIRB reviews institution's local context considerations before approving new study at institution***
  - ***CIRB reviews locally-developed recruitment/educational materials; locally-occurring unanticipated problems or serious or continuing non-compliance; responds to investigator/institution questions***
  - ***Institution is responsible for monitoring conduct of research***
    - **Includes reporting concerns to CIRB**

Division of Responsibilities under CIRB Model

CIRB

- *Initial Review*
- *Continuing Review*
- *Amendment Review*
- *Conducts reviews for institutional local context considerations*
- *Reviews/determines Unanticipated Problems both locally-occurring and trial-wide impact*

Signatory Institution

- *Ensures safe and appropriate conduct of research at the institution*
- *Maintains records for CIRB-approved studies per network/program guidelines*

Typical CIRB Composition

- **One Chair and 15 Voting Members (16 Total)**

Patient Advocates	4 (25%)
Physicians	8 (50%)
Other Professionals	4 (25%)
Nurses	1
Pharmacist	1
Statistician	1
Ethicist	1

Adult CIRB - Early Phase Emphasis Composition

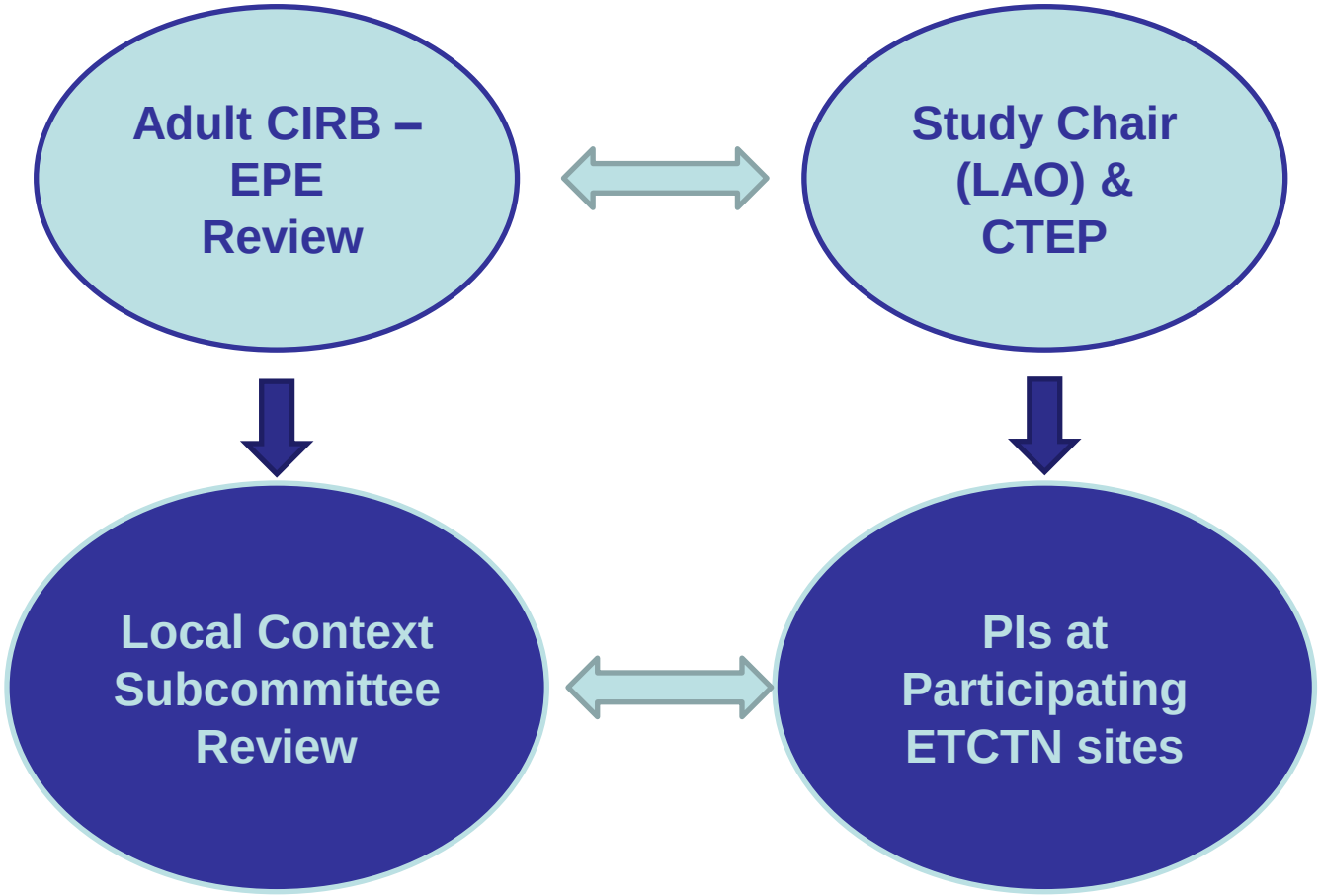
- **One Chair and 10 Voting Members (11 Total)**

Patient Advocates	2 (18%)
Physicians	5 (46%)
Other Professionals	4 (36%)
Nurses	1
Pharmacist	1
Statistician	1
Ethicist	1

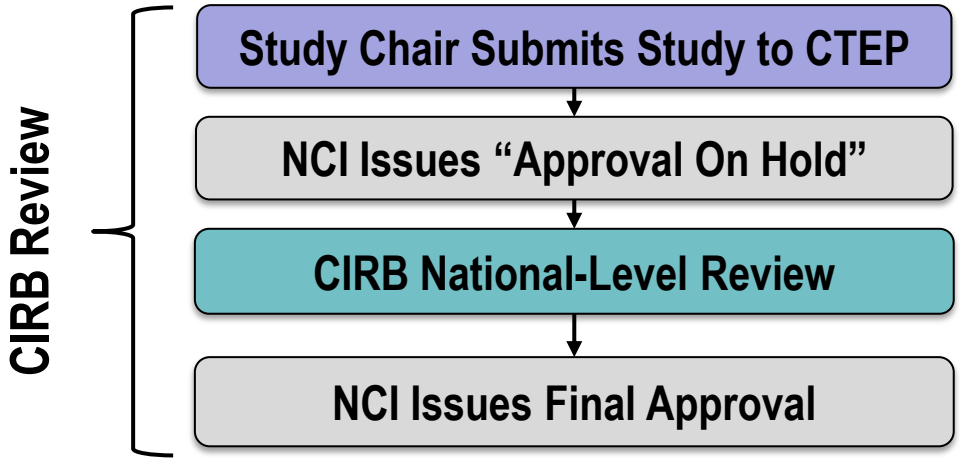
Adult CIRB - Early Phase Emphasis Members

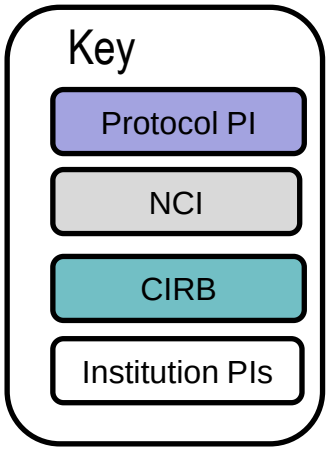
- **Suresh Nair, MD, Chair**
  Lehigh Valley Health Network
- **James Bearden, MD**
  Spartanburg Regional Health System
- **Dareth Gilmore, MSN, CNP**
  Ohio State University James Cancer Hospital
- **Susan Groshen, PhD**
  USC/Norris Comprehensive Cancer Center
- **Patricia Haugen**
  Patient Advocate
  South Dakota Coordinator for National Breast Cancer Coalition
- **Edward Kim, MD**
  Carolinas Healthcare System
- **Monica Mita, MD**
  Cedars-Sinai Medical Center
- **Gerald O'Neill, BS/MS, PharmD, R.Ph**
  Memorial Sloan Kettering Cancer Center
- **Karl Schwartz**
  Patient Advocate
  President and Co-Founder of Patients Against Lymphoma
- **John Sarantopoulos, MD**
  University of Texas Health Science Center at San Antonio
- **Dena Davis, JD, PhD**
  Lehigh University

How It Works



How It Works





Overview of CIRB Review

- The CIRB's initial review of a new study takes place prior to final NCI approval of the study and prior to distribution of the study to participating sites
- CIRB conducts its review of the study
- CIRB interacts directly with the Study Chair to address any issues
- CIRB notifies NCI of the CIRB's approval

Step-by-Step CIRB Review

1. CTEP PIO emails the Study Chair and the CIRB issuing "approval on hold" for the study.

2. The CIRB Operations Office acknowledges receipt and provides the Study Chair with a copy of the CIRB Application for Initial Review

3. The Study Chair completes the CIRB Application

4. The Study Chair submits the following to the CIRB

   - Completed CIRB Application
   - Model Consent Form in Word format
   - Any additional Supporting Documents

IMPORTANT NOTE:

The consent form submitted to the CIRB must be a model consent form based on the NCI Consent Form Template and should not include any locally-required information

Step-by-Step CIRB Review

5. The CIRB Ops Office Acknowledges receipt of the submission and schedules the study for CIRB review

   Note: The Adult CIRB - Early Phase Emphasis meets on the 1st and 3rd Tuesdays of the month. The submission deadline is 2 weeks prior to the meeting

6. The CIRB Ops Office completes an administrative review of the submission for accuracy; any issues identified will be resolved between the CIRB Ops Office and Study Chair prior to CIRB Review

7. The CIRB Ops Office forwards the study and supporting documents to CIRB Members to begin the review process

Step-by-Step CIRB Review

8. **10 days before the CIRB meeting the CIRB Ops Office invites the following individuals to participate in Initial Reviews:**

   - ***Study Chair***
   - ***Coordinating Group (LAO) Representatives***
   - ***Study Statistician***
   - ***CTEP Lead Reviewers***

   The role of these individuals is to provide the CIRB with the most up-to-date and accurate information about the study to aid the CIRB in its decision-making

   The email sent includes a date, time, conference line and passcode to join the CIRB meeting

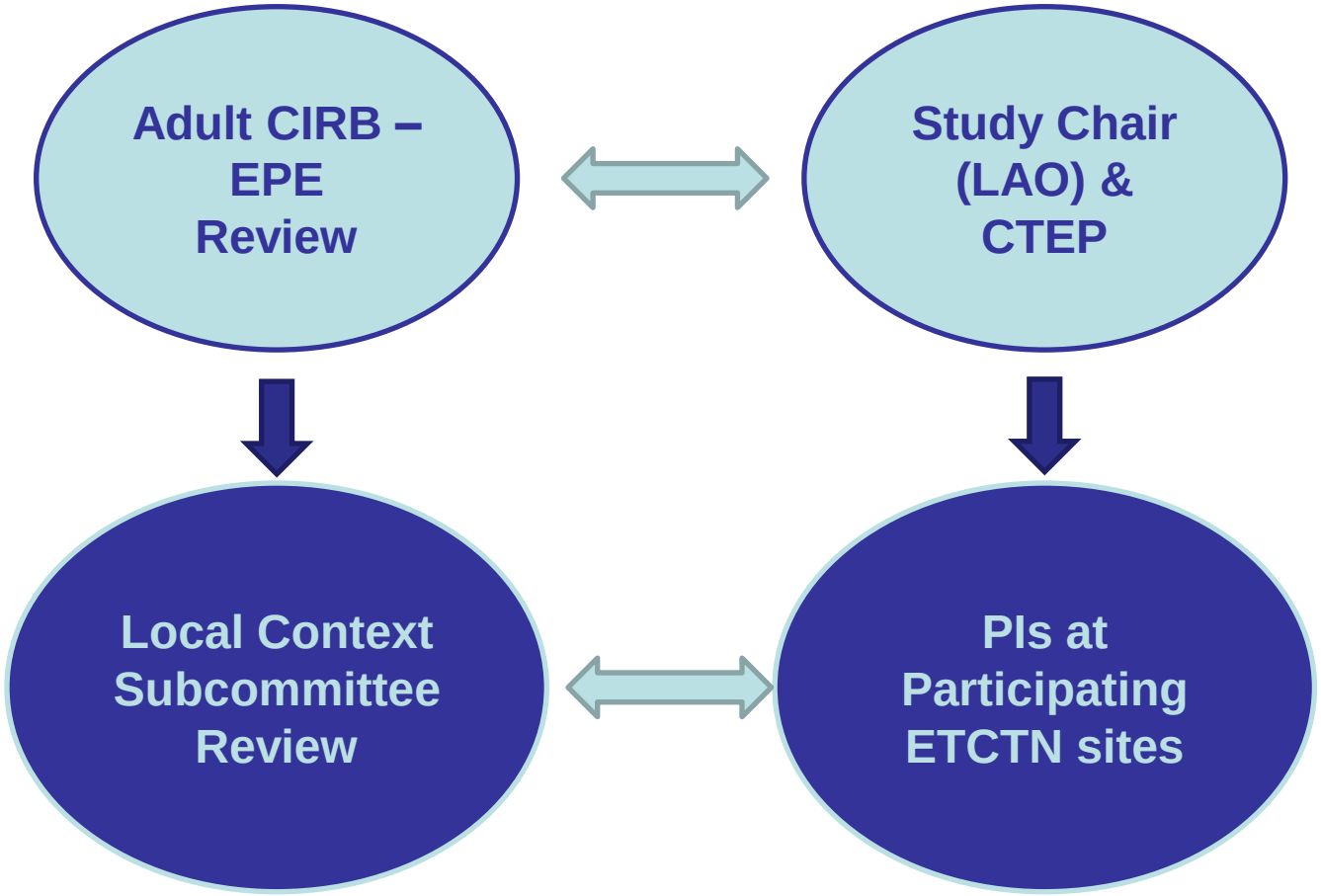
Step-by-Step CIRB Review

9. **As CIRB members complete their reviews, the CIRB Ops office will email any questions or concerns to the Study Chair in advance of the CIRB meeting**
   - ***Reply as quickly as possible in advance of the CIRB meeting***
   - ***Give as complete a response as possible***
10. **During the meeting, if the CIRB needs to discuss, you will receive an email asking you to dial in to the conference line previously provided by email.**
   - ***The CIRB Coordinator will join you to the CIRB Meeting***
   - ***CIRB Chair will lead discussion and address any questions the CIRB has with the representatives who have joined the meeting***
   - ***At end of discussion, representatives are asked to hang up***
11. **CIRB will send a letter with its determination within 7 days**

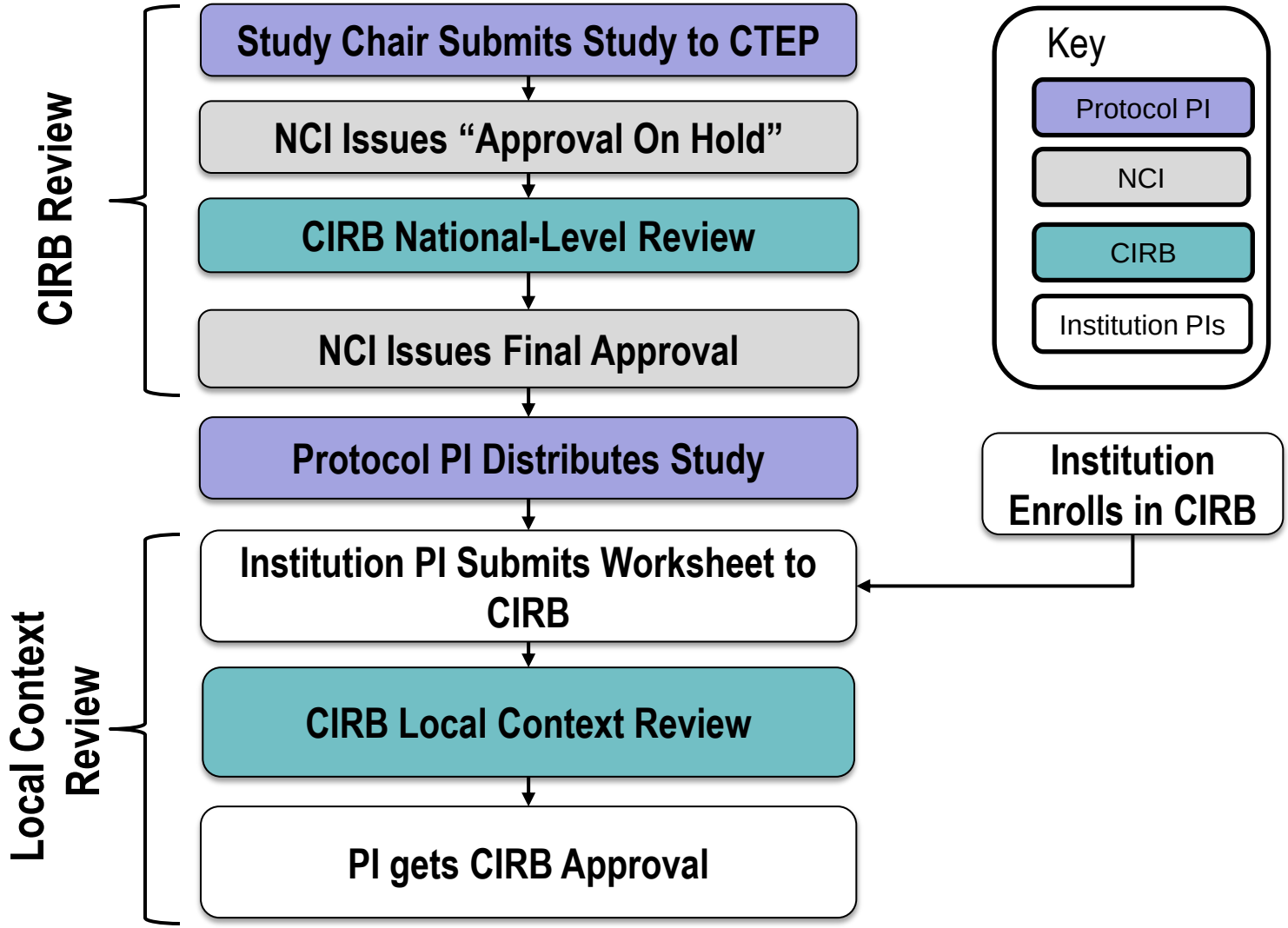
Step-by-Step CIRB Review

12. **Respond to the CIRB following the instructions included in the CIRB's letter**
    - ***Replying within the timeframe requested ensures a timely review by the CIRB***
    - ***Respond to each of the CIRB's requests***
13. **The CIRB Ops Office will forward the response for CIRB review**
    - ***Typically the review is via expedited procedures and is complete within 2 days***
    - ***Some responses require review by the convened CIRB and the response will be added to the next available agenda***
14. **The CIRB notifies the Study Chair upon approval of the study**
15. **The CIRB notifies CTEP of its approval of the study**
16. **CTEP issues final approval**
17. **The study may be distributed**

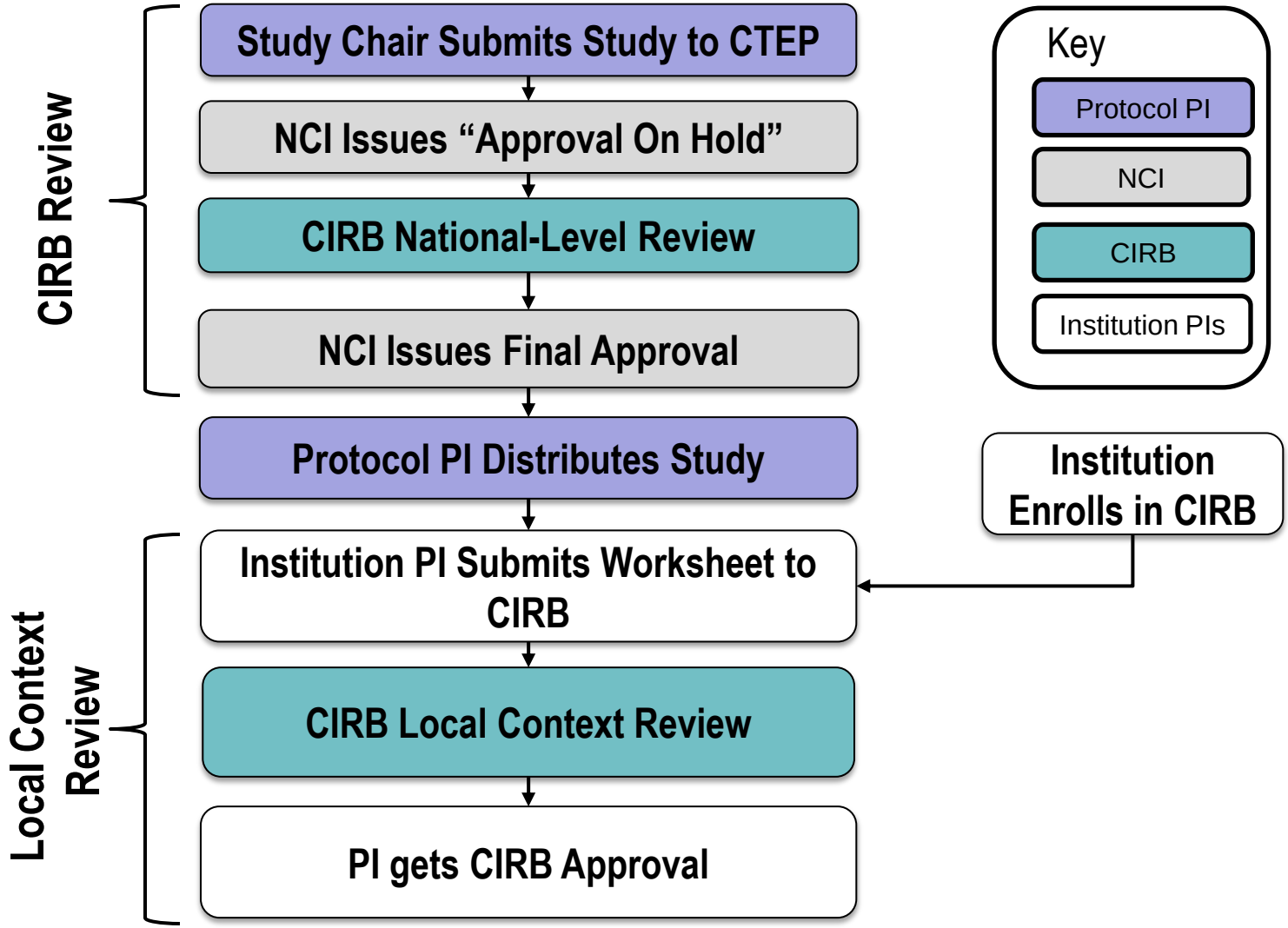
How It Works



How It Works



How It Works: Enrollment



Institutional Considerations Prior to Enrollment

- Identify the Signatory Institution
- Verify that any institutions relying on the Signatory Institution's IRB meet the CIRB's definition of a Component Institution or an Affiliate Institution
- Identify the individual(s) who will be the Signatory Institution Primary Contact(s)
- Review the information required by the CIRB to assess your institution's local context considerations
- If you have any questions, contact the CIRB Helpdesk before you begin the steps for Enrollment

Signatory Institution

- The Signatory Institution in the CIRB Initiative is the institution whose Institutional Official signs the Authorization Agreement and Division of Responsibilities document
- The Signatory Institution's responsibilities are outlined in the Division of Responsibilities
- The Signatory Institution must have a Federalwide Assurance (FWA)
- The Signatory Institution must have independent oversight of the research

Signatory Institution's Component Institution(s)

- **The Signatory Institution's Component Institution operates under a different name than the Signatory Institution but the Signatory Institution has legal authority for the Component Institution**
- **The following information for a Component Institution must be the same as the Signatory Institution:**
  - ***FWA number***
  - ***Local context considerations***
    - **If the local context considerations are not the same, the institution cannot be a Component Institution**
  - ***Boilerplate language and institutional requirements***
  - ***The office that monitors the conduct of research***

Signatory Institution's Affiliate Institution(s)

- **The following information for an Affiliate Institution must be the same as the Signatory Institution:**
  - ***Local context considerations***
    - **If the local context considerations are not the same, the institution cannot be an Affiliate Institution**
  - ***Boilerplate language and institutional requirements***
  - ***The office that monitors the conduct of research***

Local Context Considerations

- **What constitutes the CIRB's review of local context?**
  - ***Consideration of local population for any unique requirements***
  - ***Confirmation that any institutional requirements, local and state laws are appropriately addressed***
  - ***Consideration if investigator has sufficient time to conduct research safely***
  - ***Consideration if investigator has an adequate number of qualified supporting research staff***
  - ***Consideration if facilities are adequate to conduct research and protect study participants***
  - ***Confirmation that boilerplate language for the consent form complies with Federal regulations***

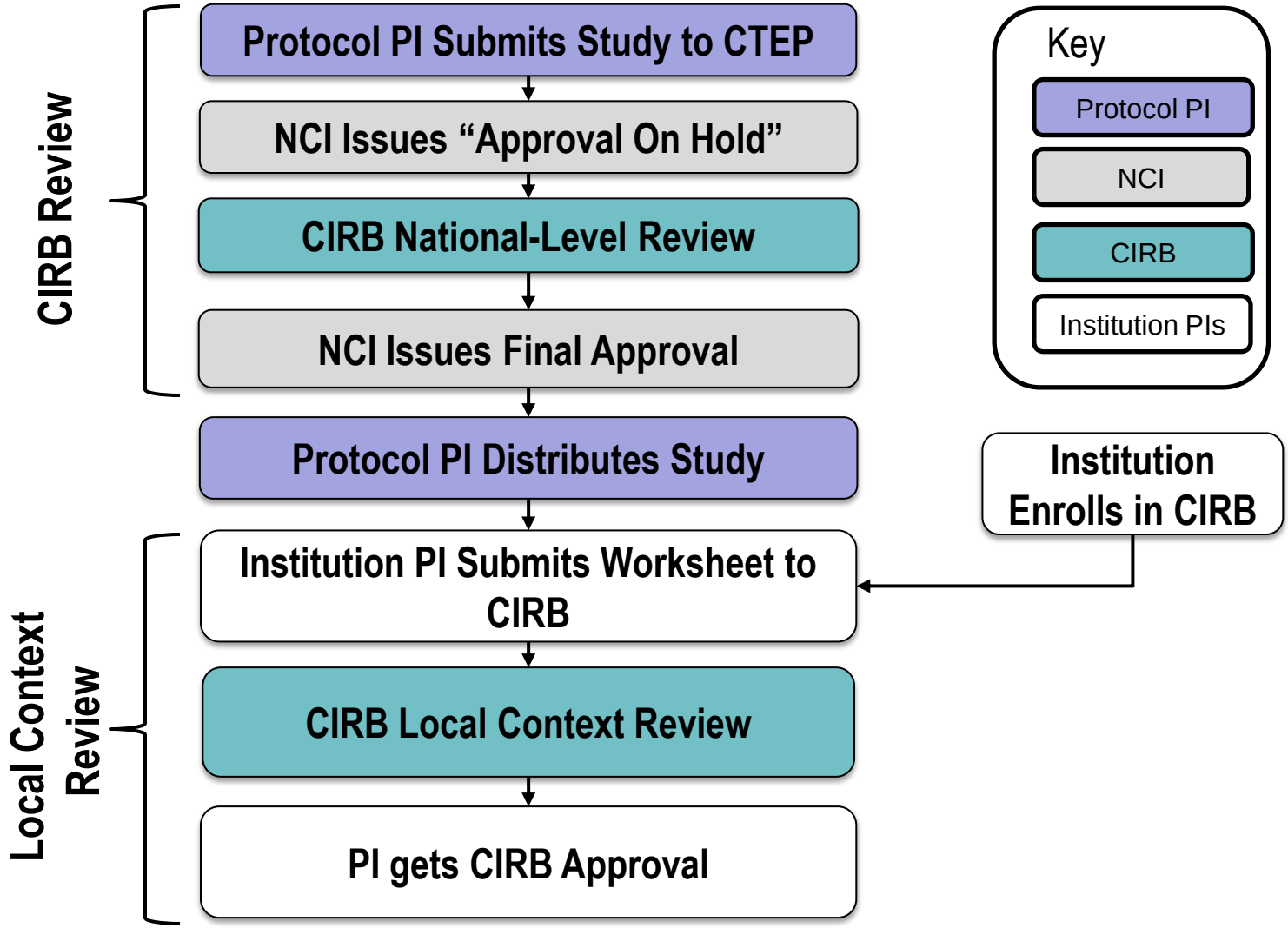
5 Easy Steps – Summary of Enrollment

1. **Complete and submit the NCI CIRB Signatory Institution Enrollment Form**
   - *Located on the CIRB website (https://www.ncicirb.org) using the "Enrollment Packet" link under the heading "How to Join"*
   - *Provides general information about your Signatory Institution and any Component or Affiliate Institution as well as contact information for key personnel*
   - *Submit via email to the CIRB Helpdesk at ncicirbcontact@emmes.com*
2. **Complete and submit signed Authorization Agreement and Division of Responsibilities document (requires signature of Signatory Official)**
   - *Located on the CIRB website (https://www.ncicirb.org) using the "Enrollment Packet" link under the heading "How to Join"*
   - *Submit hardcopy signatures via mail to the CIRB Operations Office*

5 Easy Steps – Summary of Enrollment (cont.)

3. **Complete and submit the Annual Signatory Institution Worksheet About Local Context via IRBManager**
   - *Contains descriptions of state and local laws, including required boilerplate language*
   - *A Word version of the Worksheet can be accessed on the CIRB website to view the questions prior to completion in IRBManager*
4. **Complete and submit the Annual Principal Investigator Worksheet About Local Context via IRBManager**
   - *A Word version of the Worksheet can be accessed on the CIRB website to view the questions prior to completion in IRBManager*
   - *Provides research activity descriptions*
5. **Receive letter from the CIRB confirming that enrollment is complete and may begin to open studies**

How It Works: Opening a Study



Before You Can Open a Study

- Your institution must be enrolled in the CIRB Initiative
- The CIRB has approved the Annual Principal Investigator (PI) Worksheet for the PI opening the study

How Do I Open a Study?

- **Steps to opening a study**
  - ***Identify the CIRB-approved study to open***
  - ***Requires submission of a Study-Specific Worksheet About Local Context (SSW)***
    - **Submit via IRBManager (https://nci.my.irbmanager.com) to the CIRB Operations Office**
  - ***Indicate "No Changes" or identify anything different the PI will do for this study compared to information provided on the annual Worksheets***

CIRB Review of Study-Specific Worksheet

- CIRB Local Context Coordinator conducts an Administrative Review of the SSW
- If questions arise
  - *PI and Research Staff receive email requesting clarification*
- If no questions or questions resolved
  - *CIRB Local Context Subcommittee member reviews*
- CIRB Local Context Subcommittee member reviews
  - *May require minor changes, or*
  - *Approves*

How Long Does it Take?

- **Approximately 5 days for CIRB approval of the Study-Specific Worksheet if:**
  - ***Your institution is already enrolled, and***
  - ***You are already a CIRB-approved PI***

CIRB Approval of Study-Specific Worksheet

- Once approved by the CIRB Local Context Subcommittee member, the Local Context Coordinator sends an approval letter on behalf of the CIRB
- PI has IRB approval for conduct of the study
- CTSU is notified of CIRB approval
- PI must ensure any requirements specific to their local institution are met

CIRB Resources

- www.ncicirb.org
  - *Schedule of CIRB meetings and submission deadlines*
  - *CIRB Enrollment information*
  - *List of CIRB members and bios*
  - *CIRB SOPs*
  - *FAQs*
- **CIRB Helpdesk**
  - *1-888-657-3711*
  - *NCICIRBContact@emmes.com*
  - *M-F, 8am-4pm (Eastern)*

Contacting the CIRB

Helpdesk Email: ncicirbcontact@emmes.com

Helpdesk Toll-free Number: 1-888-657-3711

(May request a specific staff member when calling)

Fax Number: 1-301-560-6538

CIRB Website: http://www.ncicirb.org

Contacting the CIRB

- **CIRB Review**
  - *EarlyPhaseCIRB@emmes.com*
  - *Carol Straughn, CIRB Coordinator*
    cstraughn@emmes.com
  - *Amanda Putnick, CIP, Senior CIRB Coordinator*
    aputnick@emmes.com
  - *John Horigan, MA, CIP, CIRB Administrator*
    jhorigan@emmes.com
- **Local Context Subcommittee Review**
  - *NCICIRBContact@emmes.com (CIRB Helpdesk)*
  - *1-888-657-3711 (CIRB Helpdesk)*
  - *LaTisa Hernandez, CIP, Senior Local Context Coordinator*
    lhernandez@emmes.com
  - *Laura Covington, MS, CIP, CIRB Administrator*
    lcovington@emmes.com